

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JOY SWEETING,

Plaintiff,

v.

HIGHMARK INC.,

Defendant.

Civil Action No. 04-368 Erie

The Hon. Sean J. McLaughlin

JOINT MOTION TO EXTEND DISCOVERY PERIOD

Plaintiff and Defendant, by and through their respective counsel, hereby move the Court for an Order extending the discovery period through and including November 28, 2005, and in support thereof state as follows:

1. Discovery is currently set to close on October 12, 2005.
2. The parties have been actively engaged in discovery (including depositions, document requests, and written interrogatories) over the past several months.
3. Due to the schedules of counsel and the press of other matters, however, the parties will need additional time beyond October 12 to conduct and complete their discovery.
4. Hence, the parties jointly request that the Court extend the discovery period until November 28, 2005 and that the deadlines for filing pretrial statements and summary judgment motions be extended as set forth in the attached proposed Order.

5. This is the parties' first request for an extension of discovery in this case.

Respectfully submitted,

s/ Joel S. Sansone

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